



Desert Citizens Against Pollution

633 West Avenue J-11 • Lancaster, CA 93534 • 805-942-4209 Phone/Fax

Sept. 10, 1999

Mr. Todd Thompson
SWRCB, WQD Division of Water Quality
901 P St.
Sacramento, CA 95814

Re: G.O. Biosolids Land Application DEIR

Unable to attend public hearings on the DEIR or to fully review the document due to other pressing commitments, I take this opportunity to, briefly, interject some comments.

Desert Citizens Against Pollution (DCAP) requests that The entire, 900 acre Antelope Valley Hydrologic Unit be designated "as unique and valuable public resource" (finding 18. DEIR) and not just the areas above 3,500 feet as proposed and thereby become "not applicable" to the General Order.

Such an exclusion from the GO, in our opinion, is warranted by the fact that the area is a closed-retention-basin with no river running through it to carry away contaminants. And further, there are numerous uncharted and abandoned water wells along with many unmaped ground fissures which could become preferential pathways to the water table. The area is notorious for extremely high wind speeds (see accompanying five page compilation of wind data from Fox Airfield) and though it may be only anecdotal information it should be given due consideration along with other "official wind data" that been manipulated, "meaned" and "averaged" to suit the proponents needs.

Thank you for the opportunity on comment on the DEIR.

Sincerely,

Lyle Talbot
for the members

attachments:
2page letter Nov 24 1998
5 page wind data compilation



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November 24, 1998

Mr. Todd Thompson
SWRCB Division of Water Quality
901 P St.
Sacramento, CA 95814

Subject: Comments on EIR / G.O. for biosolids land application

We, Desert Citizens Against Pollution, oppose the spreading of sewer sludge on the land in principle and strongly urge the adoption of an EIR alternative that limits a Regional Boards authority to issue waste discharge permits dealing with land application of biosolids. If the intent and purpose of said G.O. is truly the protection of our state's water quality resources, then the responsible (lead) agency, SWRCB, should allow the local, affected, public a larger role in the decision making process because their concerns are so often overlooked.

Each permit application should undergo a site-specific EIR with all due CEQA safeguards ie: public notice and local hearings and extended comment periods. To "streamline" such regulations under a state wide GO raises some doubts with the general public. The concept of "beneficial re-use" of sewage sludge and such terms as "exceptional quality" (a misnomer) when referring to such waste, with all it's inherent impurities invites distrust. Any such dubious "benefits" usually accrue to the waste haulers and unscrupulous users whereas and the liabilities, such as depressed land values and impaired health, fall on the inhabitants and owners of surrounding properties.

The strict reliance on USEPA 503 Regs without a balanced viewpoint of those opposed further erodes the public's confidence. The public's perception of the NOI to draft an EIR is that we are discussing HOW land application should be accomplished when public opinion is shouting "why should such a policy be implemented at all?" At the very first scoping meeting held in Palmdale on Nov. 9th staff acknowledged that biosolids comprise less than ONE PERCENT (1%) of the entire solid waste stream. If that is the case then there is no sensible argument for spreading contaminated sewage on the land and thereby creating possible health risks to the public.

AB 939 is often used to justify land application over landfilling but diversion of such a small percentage of the whole belies that notion because a such reduction would be miniscule at best. Further the safest way to comply with the Clean Water Act would be to discharge the biosolids into soundly engineered monofills and thereby eliminating most of the adverse effects associated with such controversial disposal methods as land application.

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The CEQA process mandates that all alternatives to the project be considered equally and not just be paid "lip service". Our organization suggests the NO PROJECT or a MODIFIED GO alternative that gives the local affected population a much stronger voice at the regional level in determining which areas should be considered exclusion-areas on a case by case basis rather than the pre determination of such zones in the EIR.

In light of the State Auditor's report of Nov. 12, 1998 which documents the dismal record of Lahontan Region "...for not fulfilling it's regulatory responsibilities...", in regard to enforcement their WDRs (especially at the Soaring Vista Ranch aka BioGro) we strongly urge the State Board to drastically limit Regional permitting authority while reserving our right of appeal of their actions to the State Board. We also recommend suspension of any current land application permits until the matter of this proposed GO has been resolved, including any and all court challenges that may arise as a result of same.

A final note about the inadequate public notice of the recent scoping meetings, the manner in which they were conducted and the shortness of written comment period. It took the direct action of local activists to alert the local citizenry about the scoping meeting and when we voiced our concerns, it was staff's response "... that it is still early in the process and there will be plenty of time after the Draft EIR is issued". Such an attitude does not square well with the concept of EARLY PUBLIC INVOLVEMENT and we deeply resent their comment that the scoping meeting was not required but just a "courtesy" to us. Please...!

R. Lyle Talbot

R. Lyle Talbot
for the members.

WIND VELOCITIES IN EXCESS OF 22 KNOTS [25.3 MPH] RECORDED IN THE ANTELOPE VALLEY FROM MAY 1, 1996 TO APRIL 30, 1997.

GENERAL SUMMARY: The following information, has been taken from the National Weather Service form MFIM-10C. Recorded at William J. Fox Tower, Lancaster, CA. Fox Tower, is the official 24 hour National Climatic Weather Observation Station for the Antelope Valley. This information has been compiled by William T. Lawthers, Air Traffic Control Specialist and license NWS Weather Observer at Fox Tower. The following data shows date of occurrence, wind direction and speed, and number of hours of duration. A summary for the entire year, shows that wind velocities occurred in excess of 22KTS [25.3MPH] for 234 days out of 365 for the period May 1, 1996 to April 30, 1997.

* Note: Wind data is read, e.g. 27022G30 First three numbers are compass direction from which the wind is coming from, wind 270 degrees (West). The Fourth and fifth numbers, "22" are the average speed of the wind in knots per hour. The "G" represents the average speed of gusting conditions in excess of the average wind speed, "Gusting 30 knots". Knots to MPH: e.g. 22 knots X 1.15 = 25.3 MPH.

MAY 1996 Summary: The month of May experienced winds in excess of 25 MPH, 29 days of 31. The average hours of duration were 9.25 hours per day. The highest wind recorded for the month : 27036G45kts.

DATE:	MAXIMUM WIND RECORDED:	HOURS OF DURATION:
5/1/96	27024G29	7
5/2/96	28022G33	12
5/3/96	26028G32	13
5/4/96	25025G28	12
5/5/96	26023G28	10
5/6/96	26027	8
5/7/96	25026G30	14
5/8/96	25026G34	15
5/9/96	26020G27	7
5/12/96	23021G26	5
5/13/96	25026G33	11
5/14/96	24024G29	15
5/15/96	21028G34	9
5/16/96	22029G34	9
5/17/96	22018G24	5
5/18/96	26024G28	12
5/19/96	26026G33	18
5/20/96	26025G30	7
5/21/96	27030G35	15
5/22/96	27036G45*	17*
5/23/96	27026G31	9
5/24/96	29020G26	4
5/25/96	22016G22	1
5/26/96	25020G28	5
5/27/96	27024G30	15
5/28/96	22023	1
5/29/96	23025	7
5/30/96	25029	3
5/31/96	26023G29	2

JUNE 1996 Summary: The month of June experienced winds in excess of 25 MPH, 27 days of 30. The average hours of duration were 5 hours per day. The highest wind recorded for the month: 25027G34kts.

DATE:	MAXIMUM WIND RECORDED:	HOURS OF DURATION:
6/1/96	06016G22	
6/3/96	25018G25	1
6/4/96	26021G31	2
6/5/96	23023	5
6/6/96	22025	1
6/7/96	23025	4
6/8/96	22020G27	3
6/9/96	24021G28	1
6/10/96	25027G34*	8
6/11/96	21023G30	10
6/12/96	22020G28	9
6/13/96	22022	6
6/14/96	23022	2
6/15/96	23024	1
6/16/96	22025	5
6/17/96	26020G26	2
6/18/96	26018G24	5
6/19/96	21025G31	3
6/20/96	21024	6
6/21/96	21023G28	4
6/22/96	25025	11
6/23/96	25027	5
6/24/96	21025	4
6/25/96	22022G30	16*
6/26/96	21018G28	5
6/27/96	25022	5
6/30/96	22019G29	6
		3

JULY 1996 Summary: The month of July experienced winds in excess of 25 MPH, 21 days of 31. The average hours of duration were 4 hours per day. The highest wind recorded for the month: 21026G32kts.

DATE:	MAXIMUM WIND RECORDED:	HOURS OF DURATION:
7/2/96	22019G25	5
7/3/96	23016G22	
7/4/96	26025	1
7/7/96	22024	9
7/8/96	23024	3
7/9/96	23025	5
7/10/96	21026G32	1
7/11/96	22018G27	6
7/12/96	23024	4
		3

JULY 1996 (CONTINUED)

DATE:	MAXIMUM WIND RECORDED:	HOURS OF DURATION:
7/13/96	22024	1
7/14/96	22024	4
7/15/96	22025	6
7/16/96	22024	4
7/17/96	22022	3
7/21/96	25013G23	1
7/22/96	22023	6
7/23/96	25027	6
7/24/96	25026	3
7/25/96	22024	4
7/26/96	21022G29	7
7/29/96	22023	1

AUGUST 1996 Summary: The month of August experienced winds in excess of 25 MPH, 15 days of 31. The average hours of duration were 4 hours per day. The highest wind recorded for the month: 22026G31kts.

DATE:	MAXIMUM WIND RECORDED:	HOURS OF DURATION:
8/1/96	23017G24	3
8/2/96	22021G31	5
8/3/96	22022G28	8
8/4/96	22025	6
8/5/96	22026G31*	10*
8/6/96	23022	2
8/8/96	21013G23	1
8/15/96	23018G24	2
8/16/96	22022G29	5
8/17/96	22024	5
8/18/96	22021G27	2
8/19/96	21024	3
8/25/96	23014G24	1
8/27/96	26016G26	3
8/31/96	23025	6

SEPTEMBER 1996 Summary: The month of September experienced winds in excess of 25 MPH, 19 of 30. The average hours of duration were 4 hours per day. The highest wind recorded for the month: 28018G35kts.

DATE:	MAXIMUM WIND RECORDED:	HOURS OF DURATION:
9/1/96	22019G25	4
9/2/96	22020G25	1

SEPTEMBER 1996 (CONTINUED)

DATE:	MAXIMUM WIND RECORDED:	HOURS OF DURATION:
9/3/96	24022	3
9/4/96	21020G27	6
9/5/96	22018G27	1
9/7/96	23022	2
9/8/96	22014G26	1
9/11/96	22024	1
9/12/96	22022	1
9/13/96	25020G27	7
9/14/96	27021G26	7
9/15/96	26026G32	11*
9/16/96	26023G30	5
9/21/96	22024	3
9/22/96	22023G29	6
9/23/96	21017G25	2
9/26/96	28018G35*	8
9/27/96	07013G22	1
9/30/96	20016G26	4

OCTOBER 1996 Summary: The month of October experienced winds in excess of 25 MPH, 15 days of 31. The average hours of duration were 7 hours per day. The highest wind recorded for the month: 29028G36.

DATE:	MAXIMUM WIND RECORDED:	HOURS OF DURATION:
10/11/96	21015G22	1
10/13/96	26021G29	7
10/15/96	26027	6
10/16/96	27025G30	12
10/18/96	23018G23	1
10/19/96	27025G34	20*
10/20/96	27019G24	2
10/21/96	06018G25	6
10/24/96	27025G31	7
10/25/96	29028G36*	11
10/26/96	03024G35	14
10/27/96	05020G30	6
10/28/96	23026	7
10/29/96	20016G24	3
10/30/96	31014G24	1

To abbreviate the remainder of this report, the months of November through April will be represented in summary form only. All records and verification are available from William T. Lawthers, Fox Tower, Lancaster, CA. Tele: (805) 948-0836. Or from the U.S. Dept. of Commerce, National Weather Service, Oxnard, CA.

November 1996 Summary: The month of November experienced winds in excess of 25 MPH, 15 days of 30. The average hours of duration were 6 hours per day. The highest wind recorded for the month: 30033G40kts.

December 1996 Summary: The month of December experienced winds in excess of 25 MPH, 17 days of 31. The average hours of duration were 4 hours per day. The highest wind recorded for the month: 20026G43kts. Note: The following wind was recorded on 12/22/96, and the winds on that day were in excess of 25 MPH for 15 hrs.

January 1997 Summary: The month of January experienced winds in excess of 25 MPH, 17 days of 31. The average hours of duration were 4 hours per day. The highest wind recorded for the month: 02026G36kts.

February 1997 Summary: The month of February experienced winds in excess of 25 MPH, 17 days of 28. The average hours of duration were 6 hours per day. The highest wind recorded for the month: 27030G40kts. Note: This 40kt. wind was recorded on 2/27/97 in which wind speeds exceeded 25 MPH for 14 hours.

March 1997 Summary: The month of March experienced winds in excess of 25 MPH, 18 days of 31. The average hours of duration were 7 hours per day. The highest wind recorded for the month: 26030G37kts. Note: The same day that the highest wind was recorded, 3/3/97, winds exceeded 25 MPH for a period of 23 hrs.

April 1997 Summary: The month of April experienced winds in excess of 25 MPH, 24 days of 30. The average hours of duration were 10 hours per day. This is the longest daily average duration for the entire year. The highest wind recorded for the month: 30036G48kts. Note: Severe winds for this month included the following: 4/4/97, wind 21031G39, 15 hours duration. 4/9/97, wind 28031G38, 20 hours of duration. 4/19/97, wind 28025G35, 17 hours of duration. 4/21/97, wind 30036G48, 17 hours of duration. 4/22/97, wind 28025G33, 15 hours of duration. 4/23/97, wind 31027G43, 22 hours of duration. 4/29/97, wind 26029G38, 18 hours of duration. 4/30/97, wind 26030G35, 16 hours of duration.

In summation, there were 234 days out of the 365, recorded from May 1, 1996 to April 30, 1997, in which the Antelope Valley experienced winds which exceeded 25 MPH. Sixty four percent (64%), of all days recorded, had winds in excess of 25 MPH. Twenty five mile per hour winds averaged 6 hours per day for the 234 days recorded. I found that there were no days recorded in which a calm wind day existed for a period longer than 7 hours.


William T. Lawthers

6/3/97
Date

Responses to Comments from Hi-CAP / Desert Citizens Against Pollution

- 48-1. SWRCB staff respectfully disagrees with the commenter's implication that biosolids application projects under the proposed GO would not protect groundwater quality in the Antelope Valley hydrologic unit. Master Responses 13, 14 and 15 generally describe the basis for the analysis of potential groundwater quality impacts in the draft EIR with respect to EPA's risk assessments conducted for the Part 503 regulations, additional protective measures in the proposed GO, and the authority of RWQCB staff to use monitoring and professional judgment to determine whether a specific biosolids application project would protect water quality. The applicability of preferential flow paths to the analysis of groundwater quality impacts is described in Master Response 16.